



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

January 5, 2021

BY ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Michael Avenatti, 19 Cr. 374 (JMF)*

Dear Judge Furman:

The Government respectfully submits this letter to request leave to file a reply on or before January 7, 2022, in response to the defendant's opposition to the Government's motion to preclude the proffered expert testimony by Donald Vilfer, which was filed on January 4, 2022 (Dkt. No. 202), in light of certain of the arguments that the defendant raised therein, including his contention that he may offer affirmative evidence about the thoroughness and good faith of the Government's investigation and the case law on which he relied in support of that argument. (*See id.* at 2-4.)

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/
Matthew D. Podolsky
Andrew A. Rohrbach
Robert B. Sobelman
Assistant United States Attorneys
(212) 637-1947/2345/2616

cc: Robert M. Baum, Esq. (by ECF)
Andrew J. Dalack, Esq. (by ECF)
Tamara L. Giwa, Esq. (by ECF)